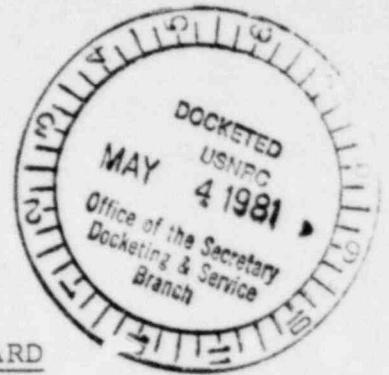


UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION



BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of §

TEXAS UTILITIES GENERATING
COMPANY, ET AL.

\$ Docket Nos. 50-445
50-446

(Comanche Peak Steam Electric
Station, Units 1 and 2)

SUPPLEMENT TO ACORN'S ANSWERS TO
APPLICANTS' FIRST SET OF INTERROGATORIES
TO ACORN AND REQUESTS TO PRODUCE



ACORN files this its supplement to Answers to Applicants' First Set of Interrogatories to ACORN and Requests to Produce as ordered by the Board's April 13, 1981 Memorandum and Order granting Applicants' modified motions to compel ACORN to respond to and also to supplement responses to Applicants' First Set of Interrogatories to ACORN and Requests to Produce.

Further, in compliance with the Board's Order of April 13, 1981, ACORN will respond to or supplement responses to the following interrogatories in Applicants' first set of interrogatories to ACORN and requests to produce, namely, 2, 3, 6, 12, 13, 14b, 15, 16, 18-25, 30, 32, 40, 43, 47-50, 52-70, 80-100, 103, 110-124, 126-127, 130-141, 195, 199, 200 and 203-213, as soon as the information requested is developed or obtained.

SUPPLEMENTARY ANSWERS

The following supplementary answers are identified by the corresponding interrogatory set forth in Applicants' First

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Set of Interrogatories to ACORN and Requests to Produce.

Question 10. Yes.

a. ACORN would refer to the following inspection and Enforcement reports as evidence of Applicants' failure to adhere to the provisions of their construction permit as well as 10 CFR Part 50.

Excessive Rate of Goundwater Withdrawal During Construction - I&E Report Regarding Inspection Conducted June 6 and June 10, 1975.

Failure to Adhere to Procedure Requirements Regarding Concrete Transit Mix - I&E Report 75-10.

Failure to Adhere to Procedure Requirements Regarding Concrete Placement - I&E Report 75-10.

Failure to Implement Prompt Corrective Action and Provide Adequate Measures to Preclude Repetition Regarding Concrete Aggregates - I&E Report 75-13.

Failure to Provide Documented Instructions or Procedures As Prescribed Regarding Examination and Repair Activities on Seismic Category Class I Components - I&E Report 76-01.

Failure to Incorporate Approved Design Changes into Applicable Design Specification and Work Procedures - I&E Report 76-01.

Failure to Provide Prescribed Documented Instructions or Procedures for Conducting QC Surveillance of the Containment Building Steel Liner Installation - I&E Report 76-01.

Failure to Provide QC Surveillance Procedures Regarding Containment Building Seismic Category Class I Embeds Installations - I&E Report 76-01.

Failure to Provide Prescribed Documented Instructions or Work Procedures Regarding Installation of Containment Building or Seismic Category Class I Pipe Restraint Embeds - I&E Report 76-01.

Failure of QA Supervisor to Exercise Delegated Stop-Work Authority Regarding Welding of Safety Related Components - I&E Report 76-07.

Failure to Follow Procedures for Welding of Safety Related Components - I&E Report 76-07.

Failure to Follow Procedures for QA Documentation of Surveillance Activities - I&E Report 76-08.

Failure to Maintain Document Control - I&E Report 76-08.

Failure to Follow Procedures for Certification/Documentation of Inspectors - I&E Report 77-02.

Failure to Provide Welding Procedures at the Location Where the Prescribed Activity is Performed - I&E Report 77-10.

Failure to Remove Weld Surface Defect Prior to Final Acceptance - I&E Report 77-10.

Failure to Follow Pipe Fabrication Procedures - I&E Report 78-05.

Failure to Follow Concrete Testing Procedures - I&E Report 78-07.

Failure to Maintain Proper Flow in Lower Squaw Creek - I&E Report 78-08.

Failure to Follow Piping Installation Procedures - I&E Report 78-11.

Failure to Adequately Control and Tag Nonconforming Items - I&E Report 78-12.

Failure to Follow Welding Procedure - I&E Report 78-12.

Failure to Follow Concrete Testing Procedures - I&E Report 78-13.

Failure to Promptly Report a Significant Deficiency - I&E Report 78-16.

Failure to Follow Welding Procedures - I&E Report 78-18.

Failure to Achieve Adequate Radiographic Sensitivity - I&E Report 78-20.

Failure to Adequately Control and Tag Nonconforming Items - I&E Report, NRC Inspections on August 21-25, 1978.

Failure to Follow Weld Monitoring Procedures - I&E Report, NRC Inspections on August 21-25, 1978.

Failure to Follow Concrete Placement Procedure - I&E Report 79-03.

Failure to Follow Equipment Maintenance Instructions -
I&E Report 79-04.

Failure to Follow Inspection Procedure for Inspection
of Class IE Cable Tray Supports - I&E Report 79-06.

Failure to Implement the Quality Assurance Program for
Civil Construction - I&E Report 79-11.

Failure to Follow Procedures for Cable Pulling - I&E
Report 80-03.

Failure to Report a Significant Construction Deficiency -
I&E Report 80-08.

Failure to Follow Procedures for Reporting and Repair of
Damaged Electrical Cable - I&E Report 80-08.

Excessive Rate of Groundwater Withdrawal During Con-
struction - I&E Report 80-09.

Failure to Follow Piping Installation Procedures -
I&E Report 80-11.

Failure to Follow Welding Procedure - I&E Report 80-13.

Failure to Follow Electrical Inspection Procedures -
I&E Report 80-13.

Failure to Establish Quality Assurance Program For
Class 5 Pipe Support Systems - I&E Report 80-15.

Failure to Follow Construction Procedures - I&E Report
80-15.

Failure to Follow Weld Preparation Procedures - I&E
Report 80-17.

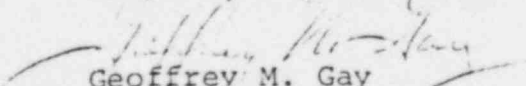
Failure to Report a Significant Construction Deficiency -
I&E Report 80-18.

b. See Answer to 10 a. above.

c. See Answer to 10 a. above.

Question 129. A disturbance of the atmosphere marked by temper-
atures below 32 degrees Farenheit, high winds and a heavy d
charge of sleet and/or snow.

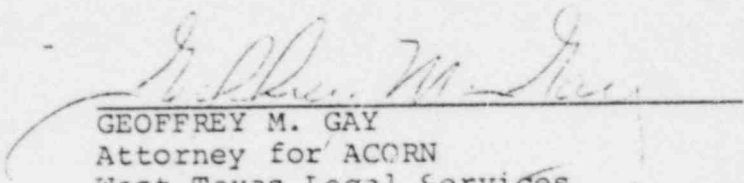
Respectfully submitted,


Geoffrey M. Gay
Attorney for ACORN

CERTIFICATION

I, Geoffrey M. Gay, Attorney for ACORN, am authorized by them to certify, and I do now declare and certify, that the foregoing Supplement to ACORN's Answers to Applicants' First Set of Interrogatories to ACORN and Requests to Produce is true and correct to the best of my knowledge and belief.

EXECUTED this 27th day of April, 1981.



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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Supplement to ACORN's Answers to Applicants' First Set of Interrogatories to ACORN and Requests to Produce in the captioned matter were served upon the following persons by deposit in the United States Mail, first class postage prepaid, on this 30th day of April, 1981:

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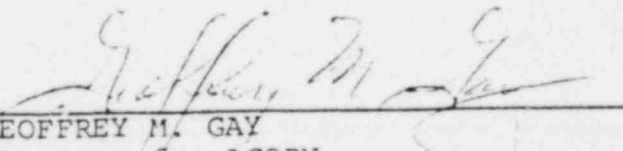
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